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April 25, 2002

Christine Kump  
Project Coordinator  
Hazardous Waste Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

Dear Ms. Kump:

Enclosed is the quarterly report for the quarter ending March 31, 2002 as required in paragraphs 91 through 94 of the Corrective Action Abatement Order on Consent, Order No. 99-HW-002 (AOC). The following summarizes the activities completed during the quarter.

**Description of Work Completed During the Quarter:**

The work plan addendum that detailed the additional work to be completed on the site (*Corrective Action Work Plan Addendum*, dated March 2002) was submitted in draft form to MDNR in January of 2002. The finalized addendum was submitted to MDNR in March 2002.

A report, titled *RCRA Corrective Action/Subsurface Investigation* (dated January 2002) was submitted in January 2002 to the MDNR. The report summarized the on-site activities that were completed in October 2001.

The stockpiled soil from the previous excavation work was removed and disposed of during the month of March 2002. An SPLP (synthetic precipitation leaching procedure) soil sampling event was also conducted during the March time frame. Due to logistical problems, the soil sampling was performed twice. A report, *RCRA Corrective Action Development of Site-Specific Soil Cleanup Levels* dated March 2002, was submitted to MDNR in March 2002 summarizing the soil stockpile removal and the SPLP results.

**Summaries of Findings, Data, Etc.:**

The report *RCRA Corrective Action Development of Site-Specific Soil Cleanup Levels* dated March 2002 summarized the removal of the stockpiled soil from the October 2001 excavation activities and detailed the SPLP results. The SPLP analysis showed a significant increase in the cleanup levels for the constituents of concern, cis-1,2-dichloroethene, trichloroethene (TCE) and vinyl chloride. Upon approval from MDNR, the current identified impacted area will be redefined using the new cleanup criteria.

Sampling in the former soil stockpile area showed one minor detection of TCE in one grid. Other sampled grids showed non-detect for any constituents of concern.

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**Summaries of Problems or Potential Problems and any Corrective Measures Implemented:**

A shipping problem and resulting expiration of the holding time limit on the first set of SPLP samples was encountered. A second SPLP soil sampling event was conducted with no problems and the analysis completed within the allowed time frames.

**Projected Work for the Next Reporting Period:**

The anticipated work to be completed consists of obtaining approval for the calculated SPLP cleanup levels and redefining the impacted soil area that requires remediation based on the new levels. A work plan for the excavation and disposal of the impacted soil will be submitted and, upon approval from MDNR, implemented. A final report of activities relating to the soil removal and disposal will be submitted when all activities have been completed.

**Instances of Non-compliance with the Requirements of the Order:**

There were no instances of non-compliance with the requirements of the Order during the quarter.

If you have any questions on this report, please contact me at (262) 636-1649 or at the letterhead address.

Sincerely,



Thomas S. Sanicola  
Senior Environmental Engineer

Cc: Modine Manufacturing Company - Camdenton  
D. Garrett - EPA Region VII  
S. Poplawski - Bryan Cave, LLP  
File(2)

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